

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: CONSTRUCTION EQUIPMENT
RENTAL ANTITRUST LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 1:25-cv-03487

MDL No. 3152

Hon. Sara L. Ellis

**DECLARATION OF JOHNSON DO IN SUPPORT OF
DEFENDANTS' JOINT MOTION TO DISMISS**

I, Johnson Do, pursuant to the requirements of 28 U.S.C. § 1746, declare as follows:

1. I am Vice President of Rental Insights at Rouse Services, LLC and have served in that capacity since January 2020. I have been employed by Rouse Services, LLC since January 2014, previously serving as Director of Client Services from January 2016 to December 2019 and as Senior Business Intelligence Analyst from January 2014 to December 2015. In the course of my employment, I have become familiar with the matters described in this Declaration, including Rouse's contracts governing the provision of access to Rouse Rental Insights (together with any prior iterations of that product, "RRI").

2. I submit this declaration in support of Defendants' Joint Motion to Dismiss (the "Motion"). I have personal knowledge of the matters set forth in this Declaration and, if called as a witness, could and would testify competently to the information below.

3. Attached as **Exhibit A** is a true and correct copy of a contract between H&E Equipment Services, Inc. and Rouse Analytics, LLC, dated December 10, 2010, which was

operative between April 1, 2021¹ and the present (the “Relevant Time Period”) with respect to RRI. Exhibit A includes limited redactions to protect the confidentiality of the fees charged for Rouse’s services, and omits contract exhibits not relevant to the Motion.

4. Attached as **Exhibit B** is a true and correct copy of a contract between Herc Rentals, Inc. and Rouse Analytics, LLC, dated September 26, 2018, and operative during the Relevant Time Period with respect to RRI. Exhibit B omits a contract exhibit not relevant to the Motion.

5. Attached as **Exhibit C** is a true and correct copy of a contract between Sunbelt Rentals, Inc. and Rouse Analytics, LLC, dated May 31, 2017, and operative during the Relevant Time Period with respect to RRI. Exhibit C omits a contract exhibit not relevant to the Motion.

6. Attached as **Exhibit D** is a true and correct copy of a contract between Sunstate Equipment Co. and Rouse Analytics, LLC, dated March 14, 2012, and operative during the Relevant Time Period with respect to RRI. Exhibit D includes limited redactions to protect the confidentiality of the fees charged for Rouse’s services, and omits contract exhibits not relevant to the Motion.

7. Attached as **Exhibit E** is a true and correct copy of a contract between United Rentals, Inc. and Rouse Analytics, LLC, dated November 1, 2019, and operative during the Relevant Time Period with respect to RRI. Exhibit E omits a contract exhibit not relevant to the Motion.

8. Attached as **Exhibit F** is a true and correct copy of the Second Amendment to the November 1, 2019 contract between United Rentals, Inc. and Rouse Analytics, LLC, dated January 1, 2025, and operative during the Relevant Time Period with respect to RRI. Exhibit F omits a contract exhibit not relevant to the Motion.


¹ Plaintiffs define the Class Period as beginning on April 1, 2021. Consolidated Amended Class Action Complaint (ECF 145) ¶ 240.

9. Attached as **Exhibit G** is a true and correct copy of a contract between Home Depot U.S.A., Inc. and Rouse Services, LLC, dated March 7, 2022, and operative during the Relevant Time Period with respect to RRI.

10. Attached as **Exhibit H** is a true and correct copy of an Addendum to the March 7, 2022 contract between Home Depot U.S.A., Inc. and Rouse Services, LLC, also dated March 7, 2022, and operative during the Relevant Time Period with respect to RRI. Exhibit H includes limited redactions to protect the confidentiality of the fees charged for Rouse's services.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief.

Executed on January 8, 2026 at Beverly Hills, California.

By: 
Johnson Do
DATE: 1-8-2026